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May 2, 2023

The Honorable Ann M. Donnelly
United States District Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Douglass Mackey, Criminal Docket No. 21-0080 (AMD)

Dear Judge Donnelly:

Upon consultation with the government and without its objection, I write respectfully to request a short additional adjustment for briefing of post-verdict motions, as follows:

May 10	Mr. Mackey's motions;
June 7	The government's response;
June 21	Mr. Mackey's reply.

I make this request because my recent commitments have prevented me from devoting time to completing my work on the motions. Over the past week alone, I have had two sentences (before Judges Korman and Broderick), the first part of a contentious fact-finding hearing, and an out-of-town trip.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Andrew J. Frisch
Andrew J. Frisch

cc: U.S. Attorney's Office